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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	Case No. 3:17-cv-00074-TMB
)	
v.)	
)	MOTION FOR PRELIMINARY
PETER YURYEVICH LEVASHOV,)	INJUNCTION
)	
Defendant.)	

Plaintiff, the United States of America, by and through its attorneys, Bryan Schroder, Acting United States Attorney for the District of Alaska, Kenneth A. Blanco, Acting Assistant Attorney General, Richard L. Pomeroy, Yvonne Lamoureux and Adam Alexander, Assistant United States Attorneys, and Ethan Arenson, Harold Chun and Frank Lin, Trial Attorneys, respectfully moves, pursuant to Title 18, United States Code, Sections 1345 and 2521 for a Preliminary Injunction against Defendant Peter Yuryevich Levashov.

1. On April 11, 2017, the Court ordered Government counsel to confer with Margarita Repina, counsel for the Defendant in Spain, regarding a new date for the Preliminary Injunction hearing in this matter.

2. On April 11, 2017, counsel for the Government sent an email to Ms. Repina attaching the Court's order and requesting that she select one of the dates

suggested by the Court for the Preliminary Injunction hearing. See Email from Ethan Arenson to Margarita Repina, attached hereto as Exhibit A.

3. On April 12, 2017, Ms. Repina sent a reply to Government counsel. Ms. Repina's email states that her client cannot travel to the United States or find someone to represent him here. Her email appears to suggest that this proceeding should be indefinitely continued, and does not indicate which of the dates offered by the Court are acceptable. See Email from Margarita Repina to Ethan Arenson, attached hereto as Exhibit B.

4. On April 12, 2017, Government counsel responded to Ms. Repina's email asking again for her to select one of the dates offered by the Court, and warning her that failing to respond could result in the Preliminary Injunction hearing going forward today. See Email from Ethan Arenson to Margarita Repina, attached hereto as Exhibit C.

5. Ms. Repina has not responded to Government counsel's latest email. Government counsel also attempted to reach her by telephone on April 12th, but was told that she was not in the office.

6. The Government is prepared to proceed with the preliminary injunction hearing scheduled for today at 2:00 p.m. and hereby moves for a preliminary injunction against the Defendant.

7. In support of its Motion, the Government respectfully refers the Court to the Government's previously filed Motion for a Temporary Restraining Order and

Order to Show Cause re Preliminary Injunction and the accompanying Declaration of Special Agent Elliott Peterson.

WHEREFORE, the Government requests that the Court enter the attached proposed Preliminary Injunction.

RESPECTFULLY SUBMITTED, on April 12, 2017 at Anchorage, Alaska.

BRYAN SCHRODER
Acting United States Attorney

KENNETH A. BLANCO
Acting Assistant Attorney General

By: /s/ Richard Pomeroy
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